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8

9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 JANELLE C. JAMES,  
15 Defendant.  
16

Case No. 2:20-cr-00218-RFB-EJY

**MOTION FOR LEAVE TO FILE  
MOTION UNDER SEAL**

17  
18 Undersigned counsel is filing an Unopposed Emergency Motion to Modify  
19 Conditions of Pretrial Release. Defense counsel believes this information will  
20 assist the Court in evaluating the motion. Because this motion contains allegations  
21 of domestic violence by a third-party against Janelle James, it should be filed under  
22 seal and remain under seal. Undersigned counsel will serve the sealed motion on  
23 the government via electronic mail.  
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25  
26

1 **CONCLUSION**

2 For the foregoing reasons, undersigned counsel respectfully requests leave  
3 to file under seal Ms. James's Unopposed Emergency Motion to Modify Conditions  
4 of Pretrial Release, and requests that the Court maintain it under seal.

5  
6 DATED this 8th of April, 2021.

7 Respectfully submitted,  
8 RENE L. VALLADARES  
Federal Public Defender

9 By: /s/ Kathryn C. Newman

10 KATHRYN C. NEWMAN  
11 Assistant Federal Public Defender  
Attorney for Janelle C. James  
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13

14 **ORDER**

15  
16 IT IS SO ORDERED.

17  
18 

19 RICHARD F. BOULWARE, II  
20 UNITED STATES DISTRICT JUDGE

21 DATED: April 8, 2021.  
22  
23  
24  
25  
26

**CERTIFICATE OF ELECTRONIC SERVICE**

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on April 8, 2021, she served an electronic copy of the above and foregoing **MOTION FOR LEAVE TO FILE MOTION UNDER SEAL** by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU  
Acting United States Attorney  
ANDREW W. DUNCAN  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ Marlene Mercado  
Employee of the Federal Public  
Defender